

Elizabeth Wolstein
Partner

212 612-0688
ewolstein@schlamstone.com

SCHLAM STONE & DOLAN LLP

26 Broadway, New York, NY 10004
Main: 212 344-5400 Fax: 212 344-7677
schlamstone.com

December 9, 2020

BY ECF

Hon. Sanket J. Bulsara
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Cruz v. Santana*, No. 20-CV-891 (EK) (SJB)

Dear Judge Bulsara:

We represent Defendant Henry Santana in the above-referenced *Bivens* action. In accordance with the Court's September 22, 2020 Scheduling Order, on behalf of both sides we respectfully enclose as Exhibit A hereto the parties' Discovery Plan Worksheet.

By separate letter-motion being filed concurrently with this submission, Defendant is requesting, with Plaintiff's consent, a stay of the deadlines set forth in the Worksheet for Phase II that are subsequent to the proposed March 24, 2020 deadline for serving initial document requests and interrogatories, pending Plaintiff's intended filing of a further amended complaint. The background to and reasons for the stay request are set forth in Defendant's letter-motion.

Thank you for your consideration of this matter.

Respectfully,



Elizabeth Wolstein

Cc: Barea Fett, Esq. (via ECF)
Gabriel P. Harvis, Esq. (via ECF)